

District Judge Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ATUL MOGHA, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Case No. 2:25-cv-00296-RSL

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND
ORDER

For good cause, Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until September 15, 2025. Plaintiffs brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel Defendants to adjudicate Plaintiffs' Form I-485, Application to Register Permanent Residence or Adjust Status. Defendants' response to the Complaint is currently due on April 25, 2025.

Courts have "broad discretion" to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for

1 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.
2 P. 1.

3 With additional time, this case may be resolved without the need of further judicial
4 intervention. U.S. Citizenship and Immigration Services (“USCIS”) issued a Request for
5 Evidence (“RFE”) to Plaintiffs last week. Plaintiffs have until July 14, 2025, to respond to the
6 RFE. USCIS will need additional time to review the RFE response and then continue processing
7 Plaintiffs’ Form I-485. Therefore, the parties believe good cause exists to stay these proceedings
8 to save the parties and this Court from spending unnecessary time and judicial resources on this
9 matter.

10 Accordingly, the parties request that the Court hold the case, including all interim
11 deadlines, in abeyance until September 15, 2025. If this case is not resolved, the parties will
12 submit a proposed briefing schedule by September 15, 2025.

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1 DATED this 22nd day of April, 2025.

2 Respectfully submitted,

3 TEAL LUTHY MILLER
Acting United States Attorney

NIMER LAW LLC

4 s/ Michelle R. Lambert

5 MICHELLE R. LAMBERT, NYS #4666657
Assistant United States Attorney
6 United States Attorney's Office
Western District of Washington
7 1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
8 Phone: (253) 428-3800
Fax: (253) 428-3826
9 Email: michelle.lambert@usdoj.gov

s/ Jennifer Nimer

JENNIFER NIMER (61962)
Nimer Law LLC
6500 Emerald Parkway, Suite 100
Dublin, Ohio 43016
Phone: 614-927-0550
Email: jnimer@nimerlaw.com

SARRAF GENTILE LLP

s/ Ronen Sarraf

RONAN SARRAF, PHV
Sarraf Gentile LLP
10 Bond Street, Suite 212
Great Neck, New York 11021
Phone: 516-699-8890
Email: ronen@sarrafgentile.com
Attorney for Plaintiff

10 *Attorneys for Defendants*

11 *I certify that this memorandum contains 279*
12 *words, in compliance with the Local Civil*
13 *Rules.*

ORDER

The case, including all interim deadlines, is held in abeyance until September 15, 2025. The parties shall submit a status report on or before September 15, 2025. It is so **ORDERED**.

DATED this 23rd day of April, 2025.



ROBERT S. LASNIK
United States District Judge